

## REMARKS

Reconsideration of this application is respectfully requested.

## **I. Status of the Claims**

Claims 1 and 9 were cancelled without prejudice or disclaimer of the subject matter therein.

Claims 2-8, 10-18, 21-24, and 27 were amended and the amendments to claims do not add new matter.

Claim 30 has been added and no new matter is added.

Claims 2-8 and 10-30 are pending in the application.

Claims 2-8 and 10-16 were objected to for informalities, Applicants have amended the claims and respectfully request that the objection be withdrawn.

## II. Acknowledgment of Allowable Subject Matter

Applicants thank the Examiner for the acknowledgment of allowable subject matter in claims 3, 10, 12-16, 18-22, 24 and 27-28.

### III. Rejections under 35 U.S.C. § 102

Claims 2, 8, 11, 17, 23, and 29 are rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 4,036,365 to Rosenfeld. The Examiner contends that Rosenfeld discloses all the elements of the claims. Applicants respectfully traverse the rejection.

The Examiner contends that Rosenfeld's hopper 20 "dispenses" the laundry pieces, as claimed in independent claims; claim 17 ("a feed device that receives the laundry pieces and

dispenses them”); claim 23 (“dispensing the laundry pieces from the feed device...”); and claim 29 (“a feed device that receives the laundry pieces and dispenses them”). Applicants respectfully disagree. Rosenfeld’s hopper 20 does not actively dispense the laundry pieces. It is sloped to form a laundry pile and nothing else. Presenting the laundry pieces to the picker 50 is not dispensing. The dictionary categories “dispensing” as a verb and defines it to “to deal out in portions.” *See*, Merriam-Webster Online (<http://www.m-w.com/dictionary/dispense>), last accessed March 17, 2006. Applicants submit that the Examiner’s interpretation of “dispense” is not consistent with the dictionary definition of the word. Rosenfeld’s hopper is a static device and performs no action.

As an example, a candy vending machine presents and dispenses candy, and these are distinct from each other. The candy is presented behind the glass for purchase but never moves. The candy is not dispensed until a selection is made and the machine actively drops the candy down for the person to retrieve. Rosenfeld’s hopper only presents the laundry pieces but does not actively dispense them. In contrast, the claimed feed device actively dispenses the laundry pieces by passing them through the feed device and onto the transport device, as claimed.

Thus, Rosenfeld does not teach dispensing the laundry pieces from his hopper. Further, one of ordinary skill in the art is not motivated to modify Rosenfeld’s device since it would destroy the purpose of Rosenfeld’s invention. Rosenfeld teaches and suggests only that the picker 50 should remove the laundry pieces from the hopper and the entire system is based on this premise.

Thus, claims 17, 23, and 29 are not anticipated by Rosenfeld. Further, claims 2, 8, and 11 depend from the independent claims and are allowable based at least on the arguments above. Applicants respectfully request that the rejection be withdrawn.

Regarding claim 30, Rosenfeld only discloses that the transport device is a picker on a track and not a conveyor belt. Additionally, Rosenfeld cannot be modified to use a conveyor belt. Thus, Rosenfeld does not teach the elements of claim 30.

**IV. Rejections under 35 U.S.C. § 103**

Claims 4-7 and 25-26 are rejected under 35 U.S.C. § 103(a) as obvious over Rosenfeld in view of U.S. Patent No. 4,239,435 to Weiss et al. ("Weiss"). The Examiner states that Rosenfeld does not teach or suggest registering devices and that Weiss supplies that teaching.

Applicants traverse the rejection in that claims 4-7 and 25-26 depend from independent claims 17, 23, and 29. As argued above, Rosenfeld does not teach all the elements of the independent claims. Further, Weiss does not teach or suggest the elements missing from Rosenfeld and present in the claims. Thus, claims 4-7 and 25-26 are allowable and Applicants respectfully request that the rejection be withdrawn.


**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

The Examiner is respectfully requested to contact the undersigned at the telephone number indicated below once he has reviewed the proposed amendment if the Examiner believes any issue can be resolved through either a Supplemental Response or an Examiner's Amendment.

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Respectfully submitted

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